

### **REMARKS/ARGUMENTS**

Claims 1-11 and 18-33 are pending in this Application.

Claims 1-11 and 18-33 remain pending this Application after entry of this Amendment.

In the Office Action, claims 1, 4-7, 10, 11, 18, 21-24, 27-30, 32 and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,706,097 to Schelling et al. (hereinafter "Schelling") and U.S. Patent Application Publication No. 2002/0199149 to Nagasaki et al. (hereinafter "Nagasaki"). Claims 8, 9, 25, 26, and 31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Schelling, in view of Nagasaki, and in further view of U.S. Patent No. 6,098,082 to Gibbon et al. (hereinafter "Gibbon").

### **Interview Summary**

Applicants respectfully thank the Examiner for extending an interview to Applicant's undersigned representative on Feb. 15, 2007. No agreement as to allowance of some or all of the claims, or removal of prior art cited in rejections was reached.

In regard to claim 1, Applicants' representative argued that both Schelling and Nagasaki fail to teach or suggest receiving user input identifying a concept of interest as recited in claim 1. Schelling is acknowledged by the Examiner to not disclose this limitation. Nagasaki merely discloses using an apparatus to read dot codes which represent encoded multimedia information. As discussed further below, using an apparatus to read dot codes representing a specific multimedia information is substantially different from receiving user input identifying a general topic or abstract concept as the concept of interest recited in claim 1.

Furthermore, Applicant's representative argued that both Schelling and Nagasaki fail to teach or suggest analyzing multimedia information stored by a multimedia document to identify, absent direct human interaction, information relevant to the first concept of interest as recited in claim 1. Schelling is acknowledged to not disclose receiving a concept of interest, and thus fails to identify information relevant to a receive concept of interest. Moreover, Schelling merely discloses that an operator views a video to select one or more frames of the video to represent the video as stored on a disk. As discussed further below, an operator viewing videos

to select frames to represent a specific video as stored on a disk is substantially different from analyzing multimedia information as in claim 1 to identify, absent direct human intervention, information relevant to a general topic or abstract concept as the received concept of interest in claim 1.

Additionally, Nagasaki merely discloses that dot codes are read by an apparatus and decoded to reproduce multimedia information. As discussed further below, decoding dot codes to get the actual multimedia information encoded is substantially different from analyzing multimedia information as in claim 1 to identify, absent direct human intervention, information relevant to a general topic or abstract concept as the received concept of interest in claim 1.

**Claim Rejections Under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejections and request reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) based on Schelling in view of Nagasaki and Gibbon. The Office Action alleges that the combination of references teach or disclose all of the claimed limitations of the corresponding claims and that one having ordinary skill in that art at the time of the invention would have been motivated to incorporate the teachings of Schelling with the teachings of Nagasaki and Gibbon.

Applicants respectfully submit that a prima facie case of obviousness has not been established by the evidence presented in the Office Action. In order to establish a prima facie showing of obviousness, three requirements must be satisfied: all limitations of a pending claim must be expressly or impliedly disclosed by prior art references; there must be a suggestion or motivation in the art for the ordinarily skilled artisan to combine the limitations; and there must be a reasonable expectation of success in making such a combination. (M.P.E.P. § 2143).

In light of the above-recited requirements, Applicants respectfully submit that Schelling, Nagasaki, and Gibbon, either individually or in combination, fail to teach or suggest at least one of the claimed limitations recited in each of the corresponding claims.

**Claim 1**

Claim 1 recites a computer-implemented method of generating a paper document for a electronically stored multimedia document storing multimedia information, the multimedia information including video information, the method comprising:

accepting user input identifying a first concept of interest;  
analyzing the multimedia information stored by the multimedia document to identify, absent direct human interaction, information relevant to the first concept of interest; and  
printing the multimedia information on a paper medium to generate the paper document comprising one or more printed pages, wherein information that is identified to be relevant to the first concept of interest is annotated when printed on the one or more pages.

In various embodiments, user input is received that identifies a concept of interest. For example, a user may specify an interest in all information related to the topic or concept of “Afghanistan” in general or in the abstract. In various embodiments, multimedia information is analyzed or scanned to select only those segments of the multimedia information that contain information related to the topic or concept of Afghanistan for inclusion in a paper document. (Application: Paragraph [103]). The information relevant to the topic or concept of “Afghanistan” contained in the segments of the multimedia information printed on the paper document may be annotated or highlighted. (Application: Paragraph [153]).

Applicants respectfully submit that Schelling and Nagasaki, either individually or in combination, fail to teach or suggest each and every limitation of claim 1.

**User Input Identifying a Concept of Interest**

Claim 1 recites, in part, receiving “accepting user input identifying a first concept of interest.” Applicants respectfully submit that Schelling and Nagasaki, either individually or in combination, fail to teach or suggest accepting user input identifying a first concept of interest. Applicants note that the Office Action acknowledges that Schelling fails to teach or suggest the feature recited in claim of “accepting user input identifying a first concept of interest.”

Applicants further submit that Nagasaki fails to cure the deficiencies of Schelling, and also does not teach or suggest “accepting user input identifying a first concept of interest.” As stated in the Office Action, Nagasaki discloses a method of recording and printing

multimedia information. Nagasaki discloses that multimedia information is encoded into dot codes. (Nagasaki: Paragraph [0010]). The multimedia information encoded into the dot codes in Nagasaki then can be decoded and reproduced by reading the dot code and decoding the multimedia information there from for reproduction whether digitally or on paper. (Nagasaki: Paragraph [0013]).

In contrast to the feature recited in claim 1 of “accepting user input identifying a first concept of interest,” in Nagasaki, the user merely uses an apparatus to read actual dot codes that encode multimedia information. Applicants respectfully submit that the dot codes represent specific encoded multimedia information. The receiving of specific multimedia information as in Nagasaki is substantially different from receiving user input identifying a concept or topic which is of interest to a user as recited in claim 1. Accordingly, Applicants submit that Nagasaki does not teach or suggest accepting user input identifying a first concept of interest.

To further distinguish the general feature of “accepting user input identifying a first concept of interest,” as recited in claim 1 from the teachings of Schelling and Nagasaki, Applicants point the Examiner to dependent claim 7, which depends from claim 1. Claim 7 recites, in part, wherein accepting user input identifying the first concept of interest comprises “receiving information identifying a plurality of words associated with the first concept of interest.” As recited in claim 7, a plurality of words are received that are associated with a concept of interest. For example, as discussed above, the received word “Afghanistan” may be associated with the topic or concept of “Afghanistan, the actual country.” The received word “Afghanistan” may also be associated with the topic or concept of “the Middle East.” Schelling and Nagasaki both fail to disclose the reception of words associated with a concept of interest as event recited in claim 7.

#### Analyzing Multimedia Information

Claim 1 recites, in part, receiving “analyzing the multimedia information stored by the multimedia document to identify, absent direct human interaction, information relevant to the first concept of interest.” Applicants respectfully submit that Schelling and Nagasaki, either individually or in combination, fail to teach or suggest analyzing the multimedia information

stored by the multimedia document to identify, absent direct human interaction, information relevant to the first concept of interest.

The Office Action points to Schelling as allegedly teaching analyzing the multimedia information stored by the multimedia document to identify, absent direct human interaction, information relevant to the first concept of interest as recited in claim 1. Applicants respectfully disagree.

In Schelling, an operator of a computer system creates an index print that includes a plurality of representations of digital data files on a digital recording medium. (Schelling: Col. 2, lines 43-46). In Schelling, video sequences are played, and the operator picks out frames from the motion picture sequences for the index print. (Schelling: Col. 3, lines 2-8). Schelling also discloses that other textual or iconic representations may be provided by the operator for information that cannot be represented by still-image. (Schelling: Col. 3, lines 15-23). Schelling further discloses that index print also may be printed. (Schelling: Col. 4, lines 2-4). The index print, in Schelling, then may be viewed to access the digital data file stored on the digital recording medium. (Schelling: Col. 2, lines 5-15).

Applicants respectfully submit that the process in Schelling of an operator selecting frames, or providing textual or other iconic representations of digital data files on the digital recording Schelling does not teach or suggest analyzing multimedia information stored by a multimedia document to identify, absent direct human interaction, information relevant to a concept of interest as recited in claim 1. In Schelling, the index print represents the digital data files stored on the medium. (Schelling: Col. 1, lines 65-67). Schelling is clear that the operator views the video sequences to pick “desired” frames. In other words, frames that are “desired” to represent the video sequence stored on the medium.

The viewing, picking, and placing of video frames in Schelling that the operator wants to represent video sequences is substantially different from the analysis of multimedia information stored by a multimedia document to identify information relevant to a concept of interest as recited in claim 1. The operator in Schelling is selecting frames to represent an actual and specific file located on a disk, in contrast to identifying information related to a general topic

or abstract concept as recited in claim 1. Furthermore, the analysis and identification of video frames in Schelling does not occur without direct human intervention as required in claim 1.

Applicants further submit that a user of the index print in Schelling, viewing the index print to access files on the medium does not teach or suggest analyzing multimedia information stored by a multimedia document to identify, absent direct human interaction, information relevant to a concept of interest as recited in claim 1. Schelling merely discloses that the user view the representations on the index print. Schelling clearly does not disclose that user analyzes the actual data files on the medium as is required by the feature of analyzing multimedia information stored by a multimedia document as recited in claim 1. The mere viewing of the index print in Schelling by the user or operator to access the data files has nothing to do with the analysis of multimedia information stored by a multimedia document as recited in claim 1. Furthermore, as discussed above, none of the analysis or identification of multimedia information in Schelling occurs without direct human intervention as required in claim 1.

Accordingly, Schelling fails to teach or suggest the feature “analyzing the multimedia information stored by the multimedia document to identify, absent direct human interaction, information relevant to the first concept of interest” as recited in claim 1.

Applicants further respectfully submit that Nagasaki fails to cure the deficiencies of Schelling, and also does not teach or suggest analyzing multimedia information stored by a multimedia document to identify, absent direct human interaction, information relevant to a first concept of interest as recited in claim 1. In Nagasaki, a user merely reviews representations of multimedia information, and then uses an apparatus to read the dot codes. (Nagasaki: FIG. 2A and 2B). Dot codes read by the apparatus are then decoded to reproduce the multimedia information. Merely reading and decoding the dot codes into multimedia information is substantially different from the analysis of multimedia information to identify information relevant to concept of interest as recited in claim 1. Furthermore, the user in Nagasaki selects the dot codes for reproduction which is substantially different from identifying, absent direct human interaction, information relevant to a first concept of interest as recited in claim 1.

Accordingly, Applicants respectfully submit Nagasaki fails to teach or suggest the feature “analyzing the multimedia information stored by the multimedia document to identify,

absent direct human interaction, information relevant to the first concept of interest” as recited in claim 1.

#### Printing the Multimedia Information

As discussed previously, claim 1 recites accepting user input identifying a first concept of interest and analyzing the multimedia information stored by the multimedia document to identify, absent direct human interaction, information relevant to the first concept of interest. As a result, claim 1 provides that multimedia information is printed on a paper medium to generate the paper document comprising one or more printed pages, wherein information that is identified to be relevant to the first concept of interest is annotated when printed on the one or more pages. Applicants respectfully submit that Schelling and Nagasaki, either individually or in combination, fail to teach or suggest the same result as claim 1 where multimedia information is printed on paper on a paper medium to generate the paper document comprising one or more printed pages, wherein information that is identified to be relevant to the first concept of interest is annotated when printed on the one or more pages as recited in claim 1.

As discussed above, Schelling and Nagasaki fail to disclose the receive concept of interest and the identification of information relevant to the concept of interest as recited in claim 1. Accordingly, Applicants respectfully submit that the printing of information that is identified to be relevant to a concept of interest as recited in claim 1 is necessarily missing from Schelling and Nagasaki.

In light of the above, Applicants respectfully submit that that claim 1 is allowable over the corresponding cited references.

#### Claims 2-11 and 18-33

Applicants submit that independent claims 18 and 29 are allowable for at least a similar rationale as discussed above for the allowability of claim 1, and others. Applicants submit that dependent claims 2-11, 19-28, and 30-33 that depend directly and/or indirectly from the independent claims 1, 18, and 29 respectively, are also allowable for at least a similar rationale as discussed above for the allowability of the independent claims. Applicants further

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submit that the dependent claims recite additional features that make the dependent claims allowable for additional reasons.



**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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